

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

City of Detroit, Michigan,
Debtor.

Bankruptcy Case No. 13-53846

Honorable Thomas J. Tucker

Chapter 9

**REPLY IN SUPPORT OF DEBTOR'S
THIRTY-SEVENTH OMNIBUS OBJECTION TO CERTAIN CLAIMS
(INSUFFICIENT DOCUMENTATION)**

The City of Detroit ("City"), by its undersigned counsel, files this reply in support of its *Thirty-Seventh Omnibus Objection to Certain Claims* ("Objection," Doc. No. 10812), stating as follows:

1. On March 10, 2016, the City filed its Objection. As set forth on Exhibit 2 to the Objection, the City objected to claim number 1958 of Theresa Hall. Claim number 1958 is attached as Exhibit 1. The City's claims and noticing agent served the Objection on Hall at the address identified on claim number 1958. Certificate of Service, page 17 of 21. [Doc. No. 10816].

2. On April 5, 2016, Hall filed a letter with the Court. [Doc. No. 11018].¹ The letter is attached as Exhibit 2. The letter requests that correspondence be mailed to the same address identified on the proof of claim and

¹ Additional responses were filed, but all other responses will be handled via a separate procedure recently approved by the Court. [Doc. No. 11054.]

the Certificate of Service but does not respond to the Objection or provide any documentation to support claim number 1958. Consequently, the letter should be overruled and the Objection sustained.

Dated: April 8, 2016

By: /s/ Marc N. Swanson
Jonathan S. Green (P33140)
Marc N. Swanson (P71149)
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STONE, P.L.C.
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and

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ATTORNEYS FOR THE CITY OF DETROIT

B10 (Official Form 10) (04/13) (Modified)

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT of MICHIGAN		CHAPTER 9 PROOF OF CLAIM
Name of Debtor: City of Detroit, Michigan		Case Number: 13-53846
NOTE: Do not use this form to make a claim for an administrative expense that arises after the bankruptcy filing.		
Name of Creditor (the person or other entity to whom the debtor owes money or property): Theresa A. Hall		<div style="font-size: 2em; font-weight: bold;">FILED</div> <div style="font-size: 1.2em; font-weight: bold;">FEB 20 2014</div> <div style="font-size: 0.8em;">COURT CLERK ONLY</div> <div style="font-size: 0.8em;">US Bankruptcy Court Eastern District of Michigan (If known)</div> <div style="font-size: 0.8em;">Filed on: _____</div> <div style="font-size: 1.2em; font-weight: bold; margin-top: 10px;">RECEIVED</div> <div style="font-size: 1.2em; font-weight: bold; margin-top: 10px;">FEB 24 2014</div> <div style="font-size: 0.8em; font-weight: bold; margin-top: 5px;">KURTZMAN CARSON CONSULTANTS</div>
Name and address where notices should be sent: Theresa A. Hall P.O. Box 43654 Detroit, MI 48243		
Telephone number: (313) 929-7006 email: thall@dusd.org		
Name and address where payment should be sent (if different from above): NU/A		
Telephone number: _____ email: _____		
1. Amount of Claim as of Date Case Filed: \$ <u>4,945.00</u> If all or part of the claim is secured, complete item 4. If all or part of the claim is entitled to priority, complete item 5. <input type="checkbox"/> Check this box if the claim includes interest or other charges in addition to the principal amount of the claim. Attach a statement that itemizes interest or charges.		
2. Basis for Claim: <u>Longevity Cut Election Day Eliminated; Lunch hour Cut and Annuity Free</u> (See instruction #2)		
3. Last four digits of any number by which creditor identifies debtor: _____		3a. Debtor may have scheduled account as: _____ (See instruction #3a)
4. Secured Claim (See instruction #4) Check the appropriate box if the claim is secured by a lien on property or a right of setoff, attach required redacted documents, and provide the requested information. Nature of property or right of setoff: <input type="checkbox"/> Real Estate <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Other Describe: _____ Value of Property: \$ _____ Annual Interest Rate (when case was filed) _____ % <input type="checkbox"/> Fixed or <input type="checkbox"/> Variable		Amount of arrearage and other charges, as of the time case was filed, included in secured claim, if any: \$ _____ Basis for perfection: _____ Amount of Secured Claim: \$ _____ Amount Unsecured: \$ _____
5. Amount of Claim Entitled to Priority as an Administrative Expense under 11 U.S.C. §§ 503(b)(9) and 507(a)(2). \$ _____		
5b. Amount of Claim Otherwise Entitled to Priority. Specify Applicable Section of 11 U.S.C. § _____ \$ _____		
6. Credits. The amount of all payments on this claim has been credited for the purpose of making this proof of claim. (See instruction #6)		
7. Documents: Attached are redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, security agreements, or, in the case of a claim based on an open-end or revolving consumer credit agreement, a statement providing the information required by FRBP 3001(c)(3)(A). If the claim is secured, box 4 has been completed, and redacted copies of documents providing evidence of perfection of a security interest are attached. (See instruction #7, and the definition of "redacted".) DO NOT SEND ORIGINAL DOCUMENTS. ATTACHED DOCUMENTS MAY BE DESTROYED AFTER SCANNING. If the documents are not available, please explain: _____		
8. Signature: (See instruction # 8) Check the appropriate box. <input checked="" type="checkbox"/> I am the creditor. <input type="checkbox"/> I am the creditor's authorized agent. <input type="checkbox"/> I am the trustee, or the debtor, or their authorized agent. <input type="checkbox"/> I am a guarantor, surety, indorser, or other codebtor. (See Bankruptcy Rule 3004.) (See Bankruptcy Rule 3005.) I declare under penalty of perjury that the information provided in this claim is true and correct to the best of my knowledge, information, and reasonable belief. Print Name: <u>Theresa A. Hall</u> Title: <u>Office Assistant</u> Company: <u>City of Detroit</u> Address and telephone number (if different from notice address above): _____ <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div> <u>(313) 964-9157</u> Telephone number: </div> <div> <u>thall@dusd.org</u> email: </div> </div> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div> <u>Theresa A. Hall</u> (Signature) </div> <div> <u>2/19/14</u> (Date) </div> </div>		

Theresa A. Hall

Office Assistant III

City of Detroit Water and Sewerage Finance Department - Procurement

Elimination of longevity 2 yrs @150.00/yr and 1 yr @ \$300.00.....\$600.00

Elimination of Election Day 2 yrs worked 16.....\$220.00

Elimination of Hour lunch 245hrs@13.75.....\$4,125.00

Total Claim.....\$4,945.00

FILED

2016 APR -5 A 11: 01

April 1, 2016

BANKRUPTCY COURT
E.D. MICHIGAN-DETROIT

Honorable Thomas J. Tucker
Bankruptcy Case No. 13-53846
211 W. Fort Street
Suite 2100
Detroit, MI 48226

Regarding Bankruptcy Case: No. 13-53846

Dear Honorable Tucker:

My name is Theresa Hall, I am written regarding Bankruptcy Case No 13-53846; Claim No.1958. A co-worker left this information for me regarding this case. I have not received any correspondence from the Law office of Miller, Canfield, Paddock and Stone request any information from me pertaining to this case.

Upon receiving the attached information from a co-worker, I thought you should be aware of this situation. If at all possible I am requesting information that I need to forward to the court for this case. Please forward any correspondence to Theresa A. Hall-P.O. Box 43654 – Detroit, MI 48243.

Attached is the information my co-worker left me.

Thanking you in advance for considering my request.

Sincerely,


Theresa A. Hall

Cc: Marc N. Swanson

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re: City of Detroit, Michigan, Debtor.	Bankruptcy Case No. 13-53846 Honorable Thomas J. Tucker Chapter 9
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 10, 2016, he electronically filed the foregoing Omnibus Objection to Certain Claims (the "Omnibus Objection") with the Clerk of the Court which sends notice by operation of the court's electronic filing service to all ECF participants registered to receive notice in this case. The City has engaged a Noticing Agent, which will serve the Omnibus Objection on the Claimants listed therein at the address set forth by each of the claimants on its respective proof of claim and on all parties requesting notices listed on the Master Service List, and file a subsequent Proof of Service after it has performed the service.

DATED: March 10, 2016

By: /s/ Marc N. Swanson
Marc N. Swanson
150 West Jefferson, Suite 2500
Detroit, Michigan 48226
Telephone: (313) 496-7591
Facsimile: (313) 496-8451
swansonm@millercanfield.com

The ground for objection to each claim listed below is that the claim does not contain sufficient documentation to ascertain its validity. Each of the pages in the omnibus objection is pertinent to the stated ground for objection.

Claim Number	Name	Claim Amount	Nature
3356	Ballard, William	\$23,000.00	General Unsecured
3371	Blaney, Walter	\$3,710.00	General Unsecured
2911	Danforth, Tara	\$27,665.46	General Unsecured
2887	Daniel, Shondell	\$20,492.00	General Unsecured
3457	Davenport, Terry	\$25,000.00	General Unsecured
3233	Flennoy, Winston L. II	\$1,200.00	General Unsecured
3285	Ford, Valerie	\$17,228.00	General Unsecured
1961	Ganzie, Tanya	\$4,914.16	General Unsecured
2845	Globe, Sheila	\$15,360.00	General Unsecured
1694	Greene, Sondra	\$1,000,000.00	General Unsecured
2840	Grice, Tracey	\$300.00	General Unsecured
3205	Haliburton, Terrell	\$500,000.00	General Unsecured
1958	Hall, Theresa	\$4,945.00	General Unsecured
3344	Holloway, Takeisha	\$20,000.00	General Unsecured
3281	Holmes, Rodney	\$25,000.00	General Unsecured
2250	Hopkins, Robin	\$4,549.28	General Unsecured
2910	Hyer, Tonya	\$10,282.75	General Unsecured
2838	Johnson, Sandra	\$300.00	General Unsecured
3127	Johnson, Yolaundra	\$21,625.50	General Unsecured
3122	McCrory, Sarah	\$27,686.00	General Unsecured